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Counsel to Debtors  
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Susan Halevy

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:

SEATON INVESTMENTS, LLC, *et al.*,

## Debtors and Debtors in Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:  
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;  
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;  
2:24-bk-12074-VZ; 2:24-bk-12075-VZ  
and 2:24-bk-12076-VZ

## Chapter 11

**STIPULATION TO FURTHER  
CONTINUE HEARING ON MOTION  
TO AUTHORIZE USE OF CASH  
COLLATERAL PURSUANT TO 11  
U.S.C. § 363(c)(2)**

## Current Hearing:

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Date: February 25, 2025

Time: 11:00 a.m.

Crtrm · 1368

## Proposed Continued Hearing:

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Date: April 1, 2025

Time: 11:00 a.m.

Crtrm: 1368

SLA Investments, LLC (“SLA”), Negev Investments, LLC (“Negev”), Susan Halevy (“Susan” or “Susan Halevy”), and Alan Gomperts (“Alan” or “Alan Gomperts”), debtors and debtors-in-possession (the “Debtors”), Archway Broadway Loan SPE, LLC, successor-in-interest to Archway Real Estate Income I REIT, LLC fka Archway Real Estate Income Fund I SPE I, LLC (“Archway”), Wells Fargo Bank National West (“Wells Fargo”) as to the 2220 Bagley Ave and 3538 Greenfield Properties, and Harvest Small Business Finance, LLC (“Harvest”) (Archway, Wells Fargo and Harvest, collectively, the “Lenders”— in the above-entitled jointly administered chapter 11 bankruptcy cases (the “Bankruptcy Cases”) hereby stipulate as follows:

## RECITALS

1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary chapter 11 cases.

2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* (“Motion”) (Docket No. 87).

3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.

4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.

5. On June 17, 2024, Wells Fargo filed Oppositions to Debtor's Motion with respect to the 2220 Bagley and 3538 Greenfield Properties. *See* Docket Nos. 100 and 101.

6. On June 17, 2024, Archway filed an *Objection by Archway Real Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Archway Objection”) (Docket No. 99).

7. On June 18, 2024, Archway filed a *Status Report re Objection by Archway Real Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Status Report”) (Docket No. 104). In the Status Report, Archway consented to limited use of cash collateral on an interim basis under certain conditions set forth therein, including that Archway’s rights and remedies with respect to the Archway Objection be reserved and preserved and that it be granted certain adequate protection,

1 including a replacement lien and restrictions on the use of cash collateral, as set forth therein  
2 (collectively, “Archway Rights and Protections”).

3       8. On July 18, 2024, the Court entered its order authorizing the Debtors’ interim use of  
4 cash collateral through July 23, 2024 (Docket No. 127) (the “Interim Cash Collateral Order”). The  
5 Interim Cash Collateral Order sets forth, preserves, and reaffirms certain rights and adequate  
6 protection measures in favor of the Lenders, including the Archway Rights and Protections  
7 (collectively, the “Lender Rights and Protections”).

8       9. A continued hearing on interim use of cash collateral was scheduled for July 23,  
9 2024.

10      10. On July 22, 2024, the Debtors and Lenders submitted a stipulation to continue the  
11 hearing interim use of cash collateral and extend authorization for use of cash collateral by  
12 approximately one month to August 27, 2024 (Docket No. 131).

13      11. On July 23, 2024, the Court entered its order approving the stipulation, thereby  
14 authorizing the use of cash collateral and continuing the hearing to August 27, 2024.

15      12. On August 26, 2024, the Debtors and Lenders submitted a stipulation to further  
16 continue the hearing on interim use of cash collateral and to extend authorization for use of cash  
17 collateral to October 8, 2024 (Docket No. 174).

18      13. On August 26, 2024, the Court entered its order approving the stipulation, which  
19 authorized cash collateral use and continued the hearing to October 8, 2024 (Docket No. 176).

20      14. On October 3, 2024, the Debtors and Lenders submitted a further stipulation to  
21 continue the hearing on interim use of cash collateral and to extend authorization for use of cash  
22 collateral to November 12, 2024 at 11:00 a.m. (Docket No. 210).

23      15. On October 9, 2024, the Court entered its order approving the stipulation, which  
24 authorized cash collateral use and continued the hearing to November 12, 2024 (Docket No. 215).

25      16. On November 8, 2024, the Debtors and Lenders submitted a further stipulation to  
26 continue the hearing on interim use of cash collateral and to extend authorization for use of cash  
27 collateral to December 10, 2024 at 11:00 a.m. (Docket No. 288).

28      17. On November 12, 2024, the Court entered its order approving the stipulation, which

authorized cash collateral use and continued the hearing to December 10, 2024 (Docket No. 290).

18. On December 4, 2024, Alan Gomperts and Wells Fargo submitted two stipulations authorizing the use of cash collateral as to the 2220 Bagley Ave and 3538 Greenfield Properties (together, the “Wells Fargo Stipulations,” Docket Nos. 335, 338).

19. On December 10, 2024, the Court rescheduled/continued the hearing on the continued use of cash collateral to February 25, 2025 at 11:00 a.m.

20. On December 20, 2024, the Court entered orders approving the Wells Fargo Stipulations, but the Court only approved the continued use of cash collateral on an interim basis through the date of the continued hearing on February 25, 2025 (Docket Nos. 365, 366).

21. The Lenders and the Debtors discussed and agreed to further extend cash collateral use, subject to adequate protection in the form of, without limitation, the Lender Rights and Protections.

22. Accordingly the Lenders and the Debtors enter into this stipulation.

## **STIPULATION**

23. The foregoing recitals are incorporated herein.

24. The Lenders and the Debtors stipulate and agree that the hearing on the Motion should be further continued from February 25, 2025 at 11:00 a.m. to April 1, 2025 at 11:00 a.m. (based on the Court’s “Available Self-Calendaring Dates”), or to another date convenient to the Court that is approximately one month after February 25, 2025.

25. The Lenders and the Debtors stipulate and agree that the Debtors' authorization to use cash collateral should be extended through the same date as the further continued hearing, subject to the Lender Rights and Protections.

26. Wells Fargo and debtor Alan Gomperts stipulate and agree to authorization to use cash collateral subject to the same terms and conditions in the Wells Fargo Stipulations, which shall be incorporated herein, through the date of the further continued hearing.

27. The Lenders and the Debtors stipulate and agree that all the terms of the Interim Cash Collateral Order, including the Lender Rights and Protections, shall remain in full force and

1 effect and unchanged except for the extension of the period of authorization to use cash collateral  
2 and the continuance of the hearing date on the Motion.

3 **IT IS SO STIPULATED.**

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6 Dated: February 24, 2025

**SAUL EWING LLP**

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8

By: /s/ Ryan Coy  
Zev Shechtman  
Ryan Coy  
Attorneys for debtors Susan Halevy and Alan Gomperts

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11 Dated: February 21, 2025

**WEINTRAUB ZOLKIN TALERICO & SELTH**

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LLP  
By:  
Derrick Talerico, Attorneys for debtors SLA and Negev

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[Signatures Continued on Next Page]

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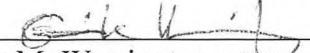
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1           **IT IS SO STIPULATED.**

2           Dated: February 19, 2025

3           **FRANDZEL ROBINS BLOOM & CSATO, L.C.**

4           By:   
5           Gerrick M. Warrington, attorneys for ARCHWAY  
6           BROADWAY LOAN SPE, LLC

7           Dated: February \_\_, 2025

8           **HEMAR, ROUSSO & HEALD, LLP**

9           By: \_\_\_\_\_  
10           Christopher Crowell, attorneys for HARVEST  
11           SMALL BUSINESS FINANCE, LLC

12           Dated: February \_\_, 2025

13           **ALDRIDGE PITE, LLP**

14           By: \_\_\_\_\_  
15           Todd S. Garan, attorneys for WELLS FARGO  
16           BANK NATIONAL WEST

## **IT IS SO STIPULATED.**

Dated: February \_\_, 2025

## **FRANDZEL ROBINS BLOOM & CSATO, L.C.**

By: \_\_\_\_\_  
Gerrick M. Warrington, attorneys for ARCHWAY  
BROADWAY LOAN SPE, LLC

Dated: February 21, 2025

## **HEMAR, ROUSSO & HEALD, LLP**

By: Christopher Crowell  
Christopher Crowell, attorneys for HARVEST  
SMALL BUSINESS FINANCE, LLC

Dated: February \_\_, 2025

## ALDRIDGE PITE, LLP

By: \_\_\_\_\_  
Todd S. Garan, attorneys for WELLS FARGO  
BANK NATIONAL WEST

1           **IT IS SO STIPULATED.**

2           Dated: February \_\_\_, 2025

3           **FRANDZEL ROBINS BLOOM & CSATO, L.C.**

4           By: \_\_\_\_\_  
5           Gerrick M. Warrington, attorneys for ARCHWAY  
6           BROADWAY LOAN SPE, LLC

7           Dated: February \_\_\_, 2025

8           **HEMAR, ROUSSO & HEALD, LLP**

9           By: \_\_\_\_\_  
10          Christopher Crowell, attorneys for HARVEST  
11          SMALL BUSINESS FINANCE, LLC

12          Dated: February 21, 2025

13          **ALDRIDGE PITE, LLP**

14          By: \_\_\_\_\_  
15            
16          Todd S. Garan, attorneys for WELLS FARGO  
17          BANK NATIONAL WEST

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067**

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation to Further Continue Hearing on Motion to Authorize Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **February 24, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*)                 , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*)                 , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 24, 2025  
Date

Hannah Richmond  
Printed Name

/s/ Hannah Richmond  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):**

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
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- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
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